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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 ) IB Docket No. 95-41  
Amendment to the Commission's )  
Regulatory Policies Governing )  
Domestic Fixed Satellites and )  
Separate International )  
Satellite Systems )

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Reply Comments of General Communication, Inc.

Pursuant to Section 1.415 of the Commission's rules, General Communication, Inc. (GCI) hereby replies to comments filed in response to the Commission's Notice of Proposed Rulemaking (NPRM).<sup>1</sup> GCI is a non-dominant facilities based interexchange carrier in Alaska that must use satellite capacity to provide service to many areas of Alaska.

**One U.S. Licensing Policy**

Most parties support the initiative of the Commission to eliminate the distinction between the Commission's Transborder and Separate Satellite Systems Policy and require all satellites providing international service to consult with Intelsat under Article XIV(d) to prevent technical or significant economic harm. The parties support the proposal to eliminate all references to transborder, domestic, separate and international in Part 25; to change the financial qualification requirements for domsat and separate systems; to allow all U.S. licensed satellite

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<sup>1</sup>Notice of Proposed Rulemaking, FCC 95-146, released April 25, 1995.

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operators to elect whether they will operate on a common carrier or non-common carrier basis; to modify its earth station licensing procedures; and, to eliminate 25.210(f) which permits exceptions to the technical requirements for separate systems.

GCI is still concerned about the ability of the satellite operator to elect whether it will operate on a common carrier or non-common carrier basis. ABC, NBC, CBS and Turner Broadcasting and ICG Wireless Services, Inc. are also concerned about the common carriage issue. The Commission should not give up its ability to require satellite operators to provide service on a common carrier basis as needed.<sup>2</sup> The Commission must monitor this situation and revisit this issue on an expedited basis if the public is not being adequately served.<sup>3</sup> The Commission must ensure that space segment capacity continues to be offered on a common carrier basis with coverage of Alaska. The Commission must ensure that any U.S. licensed satellite must continue to provide domestic satellite capabilities.<sup>4</sup>

**Non-U.S. Satellite Operators Should be Allowed to  
Provide Domestic Service**

Several parties state that reciprocal agreements must be in place before non-U.S. licensed operators can offer

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<sup>2</sup>Comments of ABC, NBC, CBS and Turner Broadcasting.

<sup>3</sup>Comments of ICG Wireless Services, Inc.

<sup>4</sup>Comments of HBO.

domestic service.<sup>5</sup> The U.S. must move quickly to work out any agreements that are necessary to allow non-U.S. licensed satellite operators to provide domestic service. As previously stated, Canadian and eastern Russian satellites<sup>6</sup> have coverage of Alaska. To ensure parity and full competition, the Commission should allow these and other non-U.S. licensed satellite operators to provide domestic service as soon as possible so the competitive goals of the Commission can be attained.

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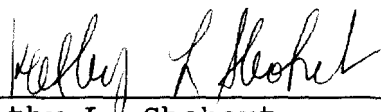
<sup>5</sup>Comments of AT&T, GE Americom, Charter Communications, Primestar and Telecomunicaciones de Mexico.

<sup>6</sup>Comments of Transworld Communications.

### Conclusion

The Commission should adopt its proposal to eliminate the distinction between its Transborder and Separate Satellite Systems Policy. However, the Commission must carefully monitor this process to ensure that satellite capacity is available on a common carrier basis. This can be assisted by allowing non-U.S. licensed satellite operators to provide domestic satellite service.

Respectfully submitted,  
General Communication, Inc.

  
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June 23, 1995

**STATEMENT OF VERIFICATION**

I have read the foregoing, and to the best of my knowledge, information and belief there is good ground to support it and that it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct.

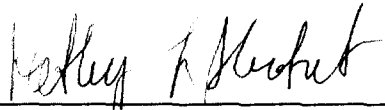
Executed June 23, 1995

A handwritten signature in cursive script, appearing to read "Kathy L. Shobert", written over a horizontal line.

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of June, 1995, the foregoing was mailed postage prepaid to the parties listed below.

  
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